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10 *Caesars Entertainment, Inc.*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 CHRISTOPHER P. BURKE, in his
14 capacity as Bankruptcy Trustee for the
15 Bankruptcy Estate of ALIX ANGELA
16 MARTINEZ,

17 Plaintiff,

18 v.

19 CAESARS ENTERTAINMENT, INC., a
20 Delaware Corporation,

21 Defendant.
22 _____/

Case No.: 3:21-cv-00194-HDM-WGC

23 **STIPULATION AND ORDER TO STAY**
24 **DISCOVERY PENDING OUTCOME OF**
25 **RESCHEDULED EARLY NEUTRAL**
26 **EVALUATION SESSION**

27 **(First Request)**

28 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff Christopher P. Burke, in his
capacity as Bankruptcy Trustee for the Bankruptcy Estate of Alix Angela Martinez
("Plaintiff"), and Defendant Caesars Entertainment, Inc. ("Defendant"), by and through
their undersigned counsel, hereby stipulate and agree, and respectfully request that the
Court stay all discovery in this action, pending the outcome of the Early Neutral
Evaluation ("ENE") session scheduled for September 24, 2021. See ECF No. 24. This
is the parties' first request to stay discovery.

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1 1. The ENE was originally scheduled to commence on July 22, 2021 before
2 Magistrate Judge Baldwin. ECF No. 14.

3 2. The ENE was subsequently rescheduled to August 6, 2021. ECF No. 21.

4 3. On August 5, 2021, Plaintiff filed an emergency motion to continue the ENE
5 due to the fact that Ms. Martinez was in the hospital. ECF No. 22.

6 4. At the ENE on August 6, 2021, the Court granted the motion and
7 rescheduled the ENE to September 24, 2021. ECF No. 24. The parties further agreed
8 to exchange information in advance of the ENE by September 7, 2021. *See id.*

9 5. Prior to the rescheduling of the ENE, on July 9, 2021, Plaintiff served a First
10 Set of Requests for Production of Documents to Defendant. The current deadline to
11 respond and object to this discovery is August 12, 2021.

12 6. On July 10, 2021, Plaintiff also noticed the deposition of Defendant on
13 September 11, 2021 pursuant to Fed. R. Civ. P. 30(b)(6). Undersigned counsel have not
14 yet had the opportunity to confer about the 63 matters for examination listed in this
15 deposition notice.

16 7. Given the timing of the rescheduled ENE and to explore the possibility of
17 settlement without incurring the expense of conducting discovery and discovery motion
18 practice, the parties stipulate, agree, and respectfully request that discovery be stayed
19 pending the outcome of the rescheduled ENE. *See also* ECF No. 24.

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8. If no resolution is reached at the ENE, that parties agree as follows: (a) Plaintiff will re-notice the deposition of Defendant; (b) counsel will confer about the topics of examination; and (c) Defendant will serve any responses and objections to Plaintiff's First Set of Requests for Production of Documents by October 22, 2021.

Dated: August 12, 2021.

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Attorneys for Plaintiff

Attorneys for Defendant

IT IS SO ORDERED.

William G. Cobb

UNITED STATES MAGISTRATE JUDGE

DATED: August 13, 2021